

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE:

SOO HOTELS, INC.,

Chapter 11, Subchapter V
Case No. 21-45708-mlo
Hon. Maria L. Oxholm

Debtor.

**STIPULATION RESOLVING SHAREHOLDER SALWAN ATTO'S
MOTION TO DISMISS CHAPTER 11, ESTABLISHING
MANAGEMENT OF DEBTOR'S OPERATIONS, REMOVING THE
DEBTOR IN POSSESSION AND APPOINTING THE SUBCHAPTER
V TRUSTEE AS TRUSTEE IN POSSESSION PURSUANT TO 11
U.S.C. §1185, AND GRANTING THE SUBCHAPTER V TRUSTEE
CERTAIN POWERS PURSUANT TO 11 U.S.C. §1106**

The Debtor in Possession, Soo Hotels, Inc., Shareholder Salwan Atto, Subchapter V Trustee, Kimberly Ross Clayson and the United States Trustee stipulate to entry of the attached order resolving shareholder Salwan Atto's motion to dismiss this Chapter 11 case, establishing management of the debtor's operations, removing the debtor in possession and appointing the Subchapter V Trustee as Trustee in Possession pursuant to 11 U.S.C. §1185 and granting the Subchapter V Trustee Certain Powers Pursuant to 11 U.S.C. §1106.

MAXWELL DUNN, PLC

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IN RE:

SOO HOTELS, INC.,

Chapter 11, Subchapter V
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_____ /

**STIPULATED ORDER RESOLVING SHAREHOLDER SALWAN
ATTO'S MOTION TO DISMISS CHAPTER 11, ESTABLISHING
MANAGEMENT OF DEBTOR'S OPERATIONS, REMOVING THE
DEBTOR IN POSSESSION AND APPOINTING THE SUBCHAPTER
V TRUSTEE AS TRUSTEE IN POSSESSION PURSUANT TO 11
U.S.C. §1185 , AND GRANTING THE SUBCHAPTER V TRUSTEE
CERTAIN POWERS PURSUANT TO 11 U.S.C. §1106**

THIS MATTER has come before the court upon the stipulation of the Debtor in Possession, Soo Hotels, Inc., Debtor's 50 percent Shareholder Salwan Atto, the Subchapter V Trustee and the United States Trustee,

IT IS HEREBY ORDERED as follows:

1. Salwan Atto's motion to dismiss this bankruptcy case is withdrawn, with prejudice. This stipulated order constitutes Mr. Atto's assent to the filing of the Debtor's petition. All disclosures made in the Debtor's petition do not reflect representations or disclosures of any person other than the Debtor and Dominic Shammami.

2. Pursuant to 11 U.S.C. §1185, the Debtor in Possession is hereby removed and the Subchapter V Trustee, Kimberly Ross Clayson, is hereby appointed as the Trustee in Possession. The Trustee shall take control of estate assets as provided in the Code.

3. The Trustee shall have the additional duties set forth in 11 U.S.C. §1106(a)(3), (4), and (7).

4. On or before August 12, 2021, Shareholder Mr. Shammami shall produce to the Trustee a complete copy of all financial records of the Debtor in Mr. Shammami's care, custody and control and which he can reasonably obtain from third parties who may have care, custody and control.

5. No later than August 9, 2021, Shareholder Mr. Shammami shall produce to the Trustee the Debtor's budget for all regular budget expenditures, including but not limited to franchise fees, rent, payroll, insurance and other regularly recurring expenses which shall include the payment schedule and/or due dates for all payments, complete name and address of all payees and all other information necessary to cause timely payment of the Debtor's regular operations.

6. Shareholder Mr. Shammami shall appear for an examination to be held no later than August 31, 2021, to be scheduled with notice of

deposition at least 7 days prior to examination and subject to continuation as needed by Subchapter V Trustee.

7. No parties other than the Trustee shall communicate with or give instructions regarding hotel operations to the Debtor's general manager and hotel staff, unless expressly authorized to do so by the Trustee.

8. Mr. Shammami shall provide to the Trustee security camera login access and ensure that the Trustee's login access is maintained until further order of the court for all cameras at the Debtor's location and specifically including the front desk camera. The front desk camera shall be positioned to provide a complete and unobstructed view of all financial transactions between hotel staff and patrons.

9. Mr. Shammami shall provide to the Trustee login access and ensure login that the Trustee's login access is maintained until further order of the court for the Debtor's franchisee management software with Choice Hotels.